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# EXHIBIT B

Declaration of Nicole Storlie,  
MSN, ARNP, PMHNP-BC  
Psychiatric Nurse Practitioner



*Where the patient is always priority.*

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08/25/2021

I am a board certified psychiatric mental health nurse practitioner. Robin Emmans has been under my care since April 12, 2021 for Major Depressive Disorder, Moderate, Recurrent and Generalized Anxiety Disorder. She was initially prescribed fluoxetine 20 mg, which is a relatively low dose of fluoxetine for an adult. She experienced side effects consistent with a much larger dose of fluoxetine, so I reduced her dose by 50 %. She accomplished this by taking the fluoxetine 20mg every other day. The plan was for her to complete her supply of fluoxetine 20mg and then begin taking fluoxetine 10mg daily. Fluoxetine is a medication that under normal circumstances takes some time to reach an effective level (often many weeks) and when stopped, the level declines slowly over time. At this time, I also prescribed clonidine 0.1 mg to take on an as-needed basis to assist with sleep and anxiety.

My understanding is that Ms. Emmans mistakenly started taking the clonidine daily instead of the fluoxetine 10 mg. Reported adverse effects of clonidine include dizziness (2% to 16% [placebo: 5%]), drowsiness (12% to 38% [placebo: 4%]), fatigue (6% to 16% [placebo: 1%]), headache (1% to 20% [placebo: 16%]), emotional disturbance (4%), insomnia (5% to 6% [placebo: 1%]), irritability (5% to 9%), lethargy (3%), nervousness (1%), night terrors (3%), nightmares (4% to 9%), restless sleep (3%), and sedated state (3% to 10%)<sup>1</sup>. She reports that she experienced drowsiness and difficulty with concentration and focus as a result of taking this medication daily.

At the same time, she was not taking the prescribed fluoxetine, and was likely experiencing symptoms of major depressive disorder and generalized anxiety disorder while believing she was still taking fluoxetine. These symptoms can include difficulty concentrating and rebound anxiety which can lead to panic attack, which is an abrupt surge of intense fear or intense discomfort that reaches a peak within minutes. She reports experiencing symptoms of panic attack (nausea, light headedness, fear of losing control)<sup>2</sup> during cross examination of a critical witness, which worsened her ability to concentrate and attend to the trial with her usual degree of function. The panic attack symptoms continued well into that evening.

*Nicole Storlie ARNP*

Nicole Storlie, MSN, ARNP, PMHNP-BC  
Psychiatric Nurse Practitioner

*8/25/2021*  
Date

<sup>1</sup> Clonidine: Drug Information. Lexicomp 2021. [https://www.uptodate.com/contents/clonidine-drug-information?search=clonidine&source=panel\\_search\\_result&selectedTitle=1~148&usage\\_type=panel&kp\\_tab=dru\\_g\\_general&display\\_rank=1](https://www.uptodate.com/contents/clonidine-drug-information?search=clonidine&source=panel_search_result&selectedTitle=1~148&usage_type=panel&kp_tab=dru_g_general&display_rank=1)

<sup>2</sup> Panic Disorder in adults: Lexicomp 2021 [https://www.uptodate.com/contents/panic-disorder-in-adults-epidemiology-pathogenesis-clinical-manifestations-course-assessment-and-diagnosis?search=panic%20attack&sectionRank=1&usage\\_type=default&anchor=H2502463762&source=machineLearning&selectedTitle=1~150&display\\_rank=1#H2502463762](https://www.uptodate.com/contents/panic-disorder-in-adults-epidemiology-pathogenesis-clinical-manifestations-course-assessment-and-diagnosis?search=panic%20attack&sectionRank=1&usage_type=default&anchor=H2502463762&source=machineLearning&selectedTitle=1~150&display_rank=1#H2502463762)